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MATTER NO.

296-001

December 15, 2022

VIA CM/ECF

Hon. Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street, Courtroom 18A
New York, New York 10007

RE: Flynn v. Cable News Network, Inc.
Case 1:21-cv-02587 (GHW/SLC)

Dear Judge Cave:

Plaintiffs' letter-motion seeking an extension of time to complete their search of the email accounts specified in the November 23, 2022 order (ECF No. 101) is GRANTED. By **Tuesday, January 3, 2022**, Plaintiffs shall complete their search of the emails and produce all relevant documents.

The Clerk of Court is respectfully directed to close ECF No. 101.

SO ORDERED 12/15/22


SARAH L. CAVE
United States Magistrate Judge

We represent Plaintiffs, John P. “Jack” Flynn and Leslie A. Flynn (the “Flynnns”) in this matter. We also request various members of the Flynn family in connection with subpoenas issued in this action by counsel for defendant, Cable News Network, Inc. (“CNN”).

We respectfully request an extension of time to and including December 31, 2022 to complete our search of the Flynnns’ email accounts in accordance with paragraphs 3(a), 3(b) and 4 of the Court’s Order entered on November 23, 2022 [*ECF No. 97*].

In accordance with the Court’s Order, we undertook and completed a review of the remaining social media data/files for Lori Flynn, Joseph Flynn, General Flynn, Michel Flynn, Jr. and Mary Flynn O’Neill. The social media data/files were so voluminous that we were only able to complete a review of Jack and Leslie Flynn’s emails prior to the December 15, 2022 deadline.

Given the Flynnns’ counsel’s schedule, including a hearing in the District of New Hampshire on December 21, 2022 and Holiday commitments, we request additional time to complete our review of the Flynnns’ email accounts.

Certification

Plaintiffs hereby certify that the required in-person or telephonic conference took place between counsel for the parties. Pursuant to Local Civil Rule 37.2, counsel for the parties conferred on December 14, 2022 and exchanged email regarding the above matters.

Counsel for CNN consents to the Flynn's counsel's request for a brief extension of the deadline to complete counsel's search of the emails.

Yours very truly,

/s/ *Steven S. Biss*

Steven S. Biss

cc. Anthony C. Carlini, Jr., Esq.
Counsel for CNN (via email)